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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
Federal Communications Commission
Washington, DC

In the Matter of) MM Docket No. 93-270
)
)
Amendment of Section 202(b),)
Table of Allotments,) RM-8323
FM Broadcast Stations) RM-8339
(Cordele, Dawson &)
Montezuma, Georgia)

To: Chief, Allocations Branch

COUNTERPROPOSAL

Tri-County Broadcasting Company ("Tri-County") and Montezuma Broadcasting ("MB"), by their attorney, hereby submit the following counterproposal to the Notice of Proposed Rule Making and Order to Show Cause, DA 93-1195 (Ass't Chief, Allocations Branch, Oct. 28, 1993) adopted in this proceeding. Tri-County and MB hereby request that the Commission amend the Table of Allotments as follows:

<u>Community</u>	<u>Current</u>	<u>Proposed</u>
Montezuma, GA	236A	280C3
Hawkinsville, GA	280C3	236C2
Cusseta, GA	279A	264A
Cuthbert, GA	264A	--

In support thereof, the following is stated:

Tri-County is the licensee of Station WCEH-FM, Hawkinsville, Georgia. Tri-County desires to upgrade its station to a Class C2 facility to enable it to improve and increase its area-wide coverage. MB is an entity desiring to provide service to community of Montezuma and its surrounding area through upgrade of Channel 236A to a commercially-viable operation

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as a Class C3 operation. As seen in the attached Engineering Statement, these objectives can be accomplished by allowing Montezuma and Hawkinsville to engage in a mutual swap of channels of allotment, namely deleting Channel 236A at Montezuma and instead allotting Channel 236C2 to Hawkinsville, and deleting Channel 280C3 at Hawkinsville and instead allotting Channel 280C3 to Montezuma. These channel swaps in turn can be accomplished by changing the allotment currently assigned to Cusseta from Channel 279A to Channel 264A, and deleting the vacant and unapplied-for Channel 264A allotment at Cuthbert. This proposal is mutually-exclusive with the proposals currently being considered in this proceeding. As a part of the proposals submitted by Radio Cordele, Inc. ("RCI") and John F. Tuck and Phonson Donaldson, Bankruptcy Court Appointed Receivers for Dawson Broadcasting Company ("DBC"), the original proponents requested that Channel 236A be substituted for Channel 252A at Cordele, Georgia. That proposal is short-spaced with the Hawkinsville C2 upgrade proposed herein.

Although this swap involved non-adjacent channels, it is not necessary under the Commission's rules for proposed Channel 236C2 at Hawkinsville to be subjected to competing expressions of interest or for the proposed channel to be opened up for competing applications. Under Section 1.420(g)(3) of the Commission's rules, licensees may request the substitution of a higher class of channel and a modification of their existing licenses in the course of a rulemaking proceeding if they are upgrading on their existing channels or on channels that are adjacent to their current channels of operation. 47 C.F.R. § 1.420(g)(3). In adopting this rule, the Commission also stated:

we are asked to consider variations of the rule which involve the need to make substitutions at other communities in order to create

a mutually exclusive relationship. The scenario is as follows: a Class A licensee operating on Channel 240A files a request to upgrade on Channel 271C2 and proposed to exchange channels with a licensee in another community currently operating on Channel 270A. It is argued that although Channels 240A and 271C2 are not adjacent, nevertheless Channel 271C2 is not available in the Ashbacker sense for application by other interested parties, because Channel 270A must be replaced with Channel 240A in order for the upgrade to be possible. Only the licensee on Channel 240A could utilize Channel 271C2 in this scenario. We recognize that this sequence of events is not strictly an adjacent channel relationship. However, the mutually exclusive relationship of the channels involved is similar to the subject proposal. We believe that rather than foreclose this type of proposal, we shall analyze such requests on a case-by case basis to ascertain the exact factual situation and determine whether the rationale used here for the new rule...applies. The concern in all such cases would be mutually exclusive relationship which is created.

Amendment of the Commission's Rules Regarding Modification of FM Broadcast Licenses to Higher Class Co-channel or Adjacent Channels, 60 R.R.2d 114, 120 ¶ 24 (1986). Since the adoption of that Report and Order, the Commission has accepted and adopted proposals for "incompatible channel swaps" that include the required "mutual exclusivity" between the proposed swapping channels. See, e.g., Pikeville, KY, Clinchco, VA and Matewan, WV, 6 FCC Rcd 3732 (Chief, Allocations Branch 1991); Angola, Berne, Decatur, Lagrange, and Roanoke, IN; Brooklyn and Hudson, MI, 6 FCC Rcd 1230 (Acting Chief, Allocations Branch 1991); Beverly Hills, Chiefland, Holiday, Micanopy and Saratoga, FL, 8 FCC Rcd 2197 (Chief, Allocations Branch 1993). See also, Cordova, Holly Pond, and Warrior, AL, 5 FCC Rcd 6301 (Deputy Chief, Policy and Rules Div. 1990). As seen in the attached Engineering Report, in the present case, the required "mutual exclusivity" between the two channels and communities clearly exist and further, as required, Channel 280C3 is the only Class C3 channel available for

use at Montezuma and Channel 236C2 is the only Class C2 channel available for use at Hawkinsville. See Dyersburg, TN; De Witt, Heber Springs, Hoxie, Jonesboro, and Newport, AR, 4 FCC Rcd 4814, 4816 ¶ 16 (Chief, Allocations Branch 1989); Utica, Hazelhurst and Vicksburg, MS, MM Docket No. 93-158, Report No. 1962 (Aug. 31, 1993). Thus, it is requested that it be determined that the parties have proposed a valid "incompatible channel swap" within the meaning of the Commission's Report and Order.

It should be noted that there is also no impediment to the substitution of Channel 264A for Channel 279A at Cusseta, Georgia. Channel 279A is a vacant allotment at Cusseta, Georgia, and although there are several applicants for the allotment, Channel 264A is fully spaced to all applicants' proposed sites, as required under the Commission's Rules. Conflicts Between Applications and Petition for Rulemaking to Amend the FM Table of Allotments, 7 FCC Rcd 4917, 4919 ¶ 10 (1992).

Finally, Channel 264A, Cuthbert, Georgia should be deleted. It was allotted by Report and Order in MM Docket No. 84-231 (Implementation of BC Docket 80-90 to Increase the Availability of FM Broadcast Assignments, 100 F.C.C.2d 1332, 1343 (1985)), and remains vacant to this day with no applications pending for its use.¹

Adoption of this proposal will be in the public interest. Approval of this counterproposal will allow Tri-County to improve the service that it provides to the public by greatly increasing its service area. Tri-County pledges expeditiously to apply for and to

¹ The permit at one time was assigned to "Daniel Roy Limitone" (File No. BPH-860129MH). The station, however, was never constructed, and the permit was cancelled and the call sign for the permit ("WDRL") was deleted, on June 12, 1992. No new applications ever have been filed. Report No. 15288 (June 18, 1992).

construct this proposed facility when this counterproposal is granted by the Commission. Further, allotment of Channel 280C3 to Montezuma will increase the potential service area of a potential Montezuma licensee from approximately 2503.7 square kilometers to 4769.6 square kilometers, greatly increasing the level of service that can be provided to Montezuma and the surrounding area and the commercial viability of the allotment. As Channel 236A is currently unoccupied, Channel 280C3 will be available for application to the general public; however, MB hereby states its intention to submit an application for Channel 280C3 when this Counterproposal is granted and the channel is allotted by the Commission.

Accordingly, Tri-County Broadcasting Company and Montezuma Broadcasting respectfully request that the Commission amend the FM Table of Allotments to delete Channel 236A at Montezuma, Georgia and add Channel 280C3; delete Channel 280C3 at Hawkinsville, Georgia and add Channel 236C2; to exchange Channel 262A for Channel 279A at Cusseta, Georgia; and to delete Channel 264A at Cuthbert, Georgia. Insofar as Tri-County and MC are proposing mutually-exclusive "incompatible channel swaps," it is not appropriate that the Commission accept any competing expressions of interest for the Channel 236C2 at Hawkinsville by any outside party.

WHEREFORE, it is respectfully requested that this Counterproposal be adopted,
and the Commission request comment on the proposal contained herein.

Respectfully submitted,

TRI-COUNTY BROADCASTING COMPANY
&
MONTEZUMA BROADCASTING

By: 

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Their Attorney

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December 20, 1993

COUNTERPROPOSAL TO MM DOC 93-270
RM-8323 RM-8339 ON BEHALF OF
TRI-COUNTY BROADCASTING COMPANY
AND MONTEZUMA BROADCASTING
December 1993

Technical Exhibit
TE-1

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COUNTERPROPOSAL TO MM DOC 93-270
RM-8323 RM-8339 ON BEHALF OF
TRI-COUNTY BROADCASTING COMPANY
AND MONTEZUMA BROADCASTING
December 1993

INTRODUCTION

This Rule Making is being filed as a Counterproposal to MM Docket #93-270 (RM-8323 and RM-8339) jointly by Tri-County Broadcasting Company ("Tri-County") and Montezuma Broadcasting ("Montezuma"). Montezuma is a proponent for a wide area Class C3 allocation at Montezuma, Georgia and Tri-County is the present licensee of WCEH-FM, 280A, Hawkinsville, Georgia. Tri-County additionally has been ordered to Class C3 in Docket #92-112 and has filed an application (BPH-9308061G) requesting a construction permit to construct the C3 facility.

PROPOSAL

Montezuma and Tri-County jointly request the FM Table of Allotments, §73.202(b) be changed to reflect the following:

	<u>Present</u>	<u>Proposed</u>
Montezuma	236A	280C3
Hawkinsville	280C3	236C2
Cusseta	279A	264A
Cuthbert	264 A	None

Montezuma states that upon the allotment of Channel 280C3 at Montezuma, Georgia, and upon the issuance of a filing window, Montezuma will timely file for the Class C3 facility. Tri-County also states its willingness to timely file an FCC Form 301 to establish WCEH-FM on Channel 236C2.

DISCUSSION

It is proposed that Channel 236A allocated at Montezuma, Georgia, and Channel 280C3 allocated at Hawkinsville, Georgia, enter into a "non-compatible swap" allowing proposed service at Montezuma, Georgia, an upgrade to Class C3 (Exhibit #2) and jointly allow Hawkinsville, Georgia, to upgrade to Class C2 (Exhibit #1) on Channel 236C2. In order for Channel 280C3 to be allocated to Montezuma, Georgia, Channel 279A, which is a vacant and applied for allotment at Cusseta, Georgia, must be changed to Channel 264A. There are multiple applicants for the Cusseta allotment; however, Channel 264A is fully spaced at all applicants' proposed transmitter sites (Exhibits #3A, #3B and #3C). Additionally, Channel 264A which is currently allocated to Cuthbert, Georgia is proposed to be deleted in order to accommodate the new Cusseta channel. The former construction permit (WDRL,

assigned to Daniel Roy Limitone, Permittee) was cancelled, and the call sign was deleted on June 12, 1992. The deletion of Channel 264A at Cuthbert, Georgia, will not leave the city unserved. WCUG (AM), which is already licensed to Cuthbert, Georgia, operates at 850 kHz with 500 Watts daytime.

INCOMPATIBLE CHANNEL SWAP

The Commission recognizes and protects from competing interests incompatible channel swaps.

"As an example, the Commission contemplated a situation where a licensee on Channel 240A at community A seeks to upgrade on Channel 271C2. To do so, the licensee on Channel 240A must exchange channels with the licensee on Channel 270A in community B. The allotment of Channel 271C2 to community A must require the deletion of Channel 270A at community B and Channel 240A must be the only Class A which can be substituted at community B." ¹

The tests for an incompatible channel swap are: (1) No other upgrade channels are available and (2) an exclusive arrangement analogous to the Commission's example (previously cited) must exist.

1) From Report and Order, MM Docket #92-155. Blair, Nebraska; Ames, Alta, Denison, Lake City, Perry, Sac City and Storm Lake, Iowa.

The Tri-County/Montezuma channel swap passes all of the above tests. No other C2 channel is available for Hawkinsville and no other C3 channel is available for Montezuma (other than the present channel at a specified site). Finally, our swap is mutually exclusive in that these are the only upgrades possible for the same desired classes. The swap is analogous with the Commission example. Passing the above tests, the Tri-County/Montezuma counterproposal involves an allowable incompatible channel swap.

MUTUAL EXCLUSIVITY

This Tri-County/Montezuma counterproposal is mutually exclusive with the Cordele/Dawson proposal requested in Docket #93-270 because of the alternate Cordele channel. Dawson Broadcasting Company ("DBC") requested as part of their overall petition that Channel 236A be substituted at Cordele, Georgia, for the presently assigned Channel 252A. §73.207 requires co-channel Class C2 and A stations to be separated by 166 kilometers. In actuality there is only a distance of 47.3 kilometers, causing the DBC and Tri-County/Montezuma proposal to be mutually exclusive.

CONCLUSION

Both Channel 236C2 at Hawkinsville, Georgia, and Channel 280C3 at Montezuma, Georgia, can be substituted in an incompatible channel swap. All known spacing requirements are met in this proposal.

REFERENCE

32 16 50 N

83 26 31 W

CLASS C2

Current rules spacings

CHANNEL 236 - 95.1 MHz

DISPLAY DATES

DATA 10-28-93

SEARCH 12-16-93

CALL TYPE	CH# LAT	CITY LNG	STATE FWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD236	236A	Cordele	GA	220.7	47.30	166.0	-118.70 *
AD	31 57 26	83 46 08	0.000 kW	0M	29.4	103.2	.
		Radio Cordele, Inc.			RM8323		930817
>PRM-Site Restricted 1.7 km Southeast-Licensed Site							
DE236	236A	Montezuma	GA	272.0	55.79	166.0	-110.21 *
DE	32 17 53	84 02 02	0.000 kW	0M	34.7	103.2	
		Radio Cordele, Inc.			RM8323		930817
>PRM							
WLML.C	236A	Montezuma	GA	272.0	55.79	166.0	-110.21 *
CP CN	32 17 53	84 02 02	6.000 kW	48M	34.7	103.2	
		Macon County Broadcasting Com			BPH871123MC		
1. WYSC	237A	Mc Rae	GA	114.5	59.75	106.0	-46.25 *
LI CN	32 03 25	82 51 56	3.000 kW	88M	37.1	65.9	
		WDAX, Inc.			BLH790820AA		
2. ALOPEN	236C3	Harlem	GA	35.4	164.44	177.0	-12.56 *
AL N	33 29 22	82 25 28	0.000 kW	0M	102.2	110.0	
		92-278					
>Site Restricted-Effective 5-28-93-Reserved for WCHZ per D92-278							
WCHZ.A	236C3	Harlem	GA	41.0	176.96	177.0	-0.04 *
AP ZCN	33 29 07	82 12 07	5.700 kW	164M	110.0	110.0	
		GMR Broadcasting, Inc.			BPH930907IB		
>From Channel 236C3 Per D92-278							
WFOH	235C	Atlanta	GA	333.6	189.00	188.0	1.00 <
LI CY	33 48 27	84 20 26	100.000 kW	300M	117.5	116.8	
		Jacor Broadcasting of Atlanta			BLH880106KA		
WBYZ	233C	Baxley	GA	120.4	108.49	105.0	3.49
LI CN	31 47 10	82 27 03	100.000 kW	309M	67.4	65.3	
		South Georgia Broadcasters, I			BLH880719KA		

236C2 HAWKINSVILLE, GA

1. WYSC, MC RAE, GA IS ORDERED TO CHANNEL 274A (DOC 92-87)
2. WCHZ RECEIVED A CONSTRUCTION PERMIT 12/7/93. EXPEDITIOUS CONSTRUCTION IS EXPECTED BY THE WCHZ LICENSEE.

EXHIBIT #1

COUNTERPROPOSAL TO DOC
93-270 ON BEHALF OF
TRI-COUNTY BCSTG CO AND
MONTEZUMA BROADCASTING

DECEMBER 1993

BROMO
COMMUNICATIONS

St Simons Island, Georgia

BROADCAST
TECHNICAL CONSULTANTS

Washington, D.C.

REFERENCE	CLASS C3	DISPLAY DATES
32 17 53 N		DATA 10-28-93
84 02 02 W	Current rules spacings	SEARCH 12-16-19
----- CHANNEL 280 -103.9 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
WCEHFM	280C3	Hawkinsville	GA	110.9	40.65	153.0	-112.35 *
AP CN	32 10 03	83 37 51	10.500 kW	151M	25.3	95.1	
Tri-County Broadcasting Compa					BPH930806IG		
>From Channel 280A Per D92-112							
WCEHFM	280A	Hawkinsville	GA	92.0	55.79	142.0	-86.21 *
LI CN	32 16 50	83 26 31	3.000 kW	78M	34.7	88.3	
Tri-County Broadcasting Compa					BLH6203		
AP279	279A	Cusseta	GA	271.2	68.64	89.0	-20.36 *
AP CN	32 18 39	84 45 45	6.000 kW	100M	42.7	55.3	
Signature Broadcasting, Ltd.					930701ME		
ALOPEN	279A	Cusseta	GA	270.6	69.81	89.0	-19.19 *
AL N	32 18 18	84 46 30	0.000 kW	0M	43.4	55.3	
92-239					WD= 930601		930701
>Effective 5-28-93							
AP279	279A	Cusseta	GA	271.5	70.19	89.0	-18.81 *
AP CN	32 18 54	84 46 44	2.800 kW	145M	43.6	55.3	
Cusseta Broadcasting Corporat					930701MG		
AP279	279A	Cusseta	GA	270.6	70.96	89.0	-18.04 *
AP CN	32 18 18	84 47 14	4.800 kW	114M	44.1	55.3	
Gray Communications, Inc.					930701MD		
1. WEGC	279A	Leesburg	GA	191.6	75.88	89.0	-13.12 *
LI CN	31 37 40	84 11 45	3.200 kW	130M	47.2	55.3	
Rowland Albany Radio, Inc.					BLH901003KB		
>*To Channel 278C3 Per D91-336							
WYAI.C	281C1	La Grange	GA	328.8	144.47	144.0	0.47 <
CP DCN	33 24 43	84 50 03	60.000 kW	371M	89.8	89.5	
NewCity Communications of Mas					BPH930405IC		
WYAI	281C1	La Grange	GA	328.8	144.47	144.0	0.47 <
LI CN	33 24 43	84 50 03	60.000 kW	371M	89.8	89.5	
NewCity Communications of Mas					BLH860807KC		

280C3 MONTEZUMA, GA

1. WEGC BEGAN OPERATION ON 278C3 12/1/93
FORM 302 WAS SUBSEQUENTLY FILED.

EXHIBIT #2

COUNTERPROPOSAL TO DDC
93-270 ON BEHALF OF
TRI-COUNTY BCSTG CO AND
MONTEZUMA BROADCASTING

DECEMBER 1993

BROMO
COMMUNICATIONS

St Simons Island, Georgia

BROADCAST
TECHNICAL CONSULTANTS

Washington, D.C.

REFERENCE	CLASS A	DISPLAY DATES
32 18 54 N	Current rules spacings	DATA 10-28-93
84 46 44 W	CHANNEL 264 -100.7 MHz	SEARCH 12-16-93

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
WDRL.C	264A	Cuthbert	GA	182.9	60.91	115.0	-54.09 *
CP CN	31 45 59	84 48 40	3.000 kW	100M	37.9	71.5	
		Daniel Roy Limitone			BPH860129MH		
>CP Cancelled & Call Sign Deleted 920612							
WGSY	261A	Phenix City	AL	314.9	30.89	31.0	-0.11 *
LI CN	32 30 42	85 00 41	6.000 kW	100M	19.2	19.3	
		The Woodfin Group			BMLH900403KA		
WCJM	265A	West Point	GA	331.0	73.55	72.0	1.55 <
LI CN	32 53 42	85 09 32	1.850 kW	72M	45.7	44.8	
		Radio Valley, Inc.			BLH6035		
WCJM.C	265A	West Point	GA	331.2	73.61	72.0	1.61 <
CP ZCN	32 53 48	85 09 24	6.000 kW	54M	45.8	44.8	
		Radio Valley, Inc.			BPH910801IE		
AP267	267A	Smiths	AL	290.6	35.23	31.0	4.23
AP CN	32 25 37	85 07 45	6.000 kW	100M	21.9	19.3	
		Arthur C. & Margaret R. Angel			BPH930302MJ		930618
AP267	267A	Smiths	AL	290.6	35.23	31.0	4.23
AP CN	32 25 37	85 07 45	6.000 kW	100M	21.9	19.3	
		Cheryl Davis			BPH930301MF		930618
AP267	267A	Smiths	AL	290.0	36.06	31.0	5.06
AP CN	32 25 35	85 08 20	6.000 kW	100M	22.4	19.3	
		Smiths Broadcasting, L.P.			BPH930301MG		930618
ALOPEN	267A	Smiths	AL	298.4	38.09	31.0	7.09
AL N	32 28 42	85 08 06	0.000 kW	0M	23.7	19.3	
	92-199		WD=	930129			930301

264A CUSSETA, GA

SEARCHING AT CUSSETA BROADCASTING SITE

EXHIBIT #3A

**COUNTERPROPOSAL TO DOC
93-270 ON BEHALF OF
TRI-COUNTY BCSTG CO AND
MONTEZUMA BROADCASTING**

DECEMBER 1993

BROMO
COMMUNICATIONS
BROADCAST
TECHNICAL CONSULTANTS
St Simons Island, Georgia
Washington, D.C.

REFERENCE

32 18 18 N
84 47 14 W

CLASS A

Current rules spacings
CHANNEL 264 -100.7 MHz

DISPLAY DATES

DATA 10-28-93
SEARCH 12-16-93

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
WDRL.C	264A	Cuthbert	GA	182.2	59.77	115.0	-55.23 *
CP CN	31 45 59	84 48 40	3.000 kW	100M	37.2	71.5	
Daniel Roy Limitone					BFH860129MH		
>CP Cancelled & Call Sign Deleted 920612							
WGSY	261A	Phenix City	AL	317.4	31.14	31.0	0.14 <
LI CN	32 30 42	85 00 41	6.000 kW	100M	19.4	19.3	
The Woodfin Group					BMLH900403KA		
WCJM	265A	West Point	GA	331.9	74.15	72.0	2.15 <
LI CN	32 53 42	85 09 32	1.850 kW	72M	46.1	44.8	
Radio Valley, Inc.					BLH6035		
WCJM.C	265A	West Point	GA	332.1	74.21	72.0	2.21 <
CP ZCN	32 53 48	85 09 24	6.000 kW	54M	46.1	44.8	
Radio Valley, Inc.					BFH910801IE		
AP267	267A	Smiths	AL	292.8	34.91	31.0	3.91
AP CN	32 25 37	85 07 45	6.000 kW	100M	21.7	19.3	
Arthur C. & Margaret R. Angel					BFH930302MJ 930618		
AP267	267A	Smiths	AL	292.8	34.91	31.0	3.91
AP CN	32 25 37	85 07 45	6.000 kW	100M	21.7	19.3	
Cheryl Davis					BFH930301MF 930618		
AP267	267A	Smiths	AL	292.1	35.73	31.0	4.73
AP CN	32 25 35	85 08 20	6.000 kW	100M	22.2	19.3	
Smiths Broadcasting, L.P.					BFH930301MG 930618		
ALOPEN	267A	Smiths	AL	300.4	37.95	31.0	6.95
AL N	32 28 42	85 08 06	0.000 kW	0M	23.6	19.3	
92-199 WD= 930129					930301		
AP267	267A	Smiths	AL	296.0	39.39	31.0	8.39
AP CN	32 27 39	85 09 48	6.000 kW	100M	24.5	19.3	
Smiths Station Broadcasting					BFH930301MH 930618		
>Amended 930415							

264A CUSSETA, GA

SEARCHING AT GRAY COMMUNICATIONS, INC
SITE

EXHIBIT #3B

COUNTERPROPOSAL TO DOC
93-270 ON BEHALF OF
TRI-COUNTY BCSTG CO AND
MONTEZUMA BROADCASTING

DECEMBER 1993

BROMO
COMMUNICATIONS

BROADCAST
TECHNICAL CONSULTANTS

St Simons Island, Georgia

Washington, D.C.

REFERENCE

32 18 39 N
84 45 45 W

CLASS A

Current rules spacings

CHANNEL 264 -100.7 MHz

DISPLAY DATES

DATA 10-28-93

SEARCH 12-16-19

CALL TYPE	CH# LAT	CITY LNG	STATE	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
WDRL.C	264A	Cuthbert	GA	184.3	60.54	115.0	-54.46 *
CP CN	31 45 59	84 48 40	3.000 kW	100M	37.6	71.5	
Daniel Roy Limitone					BPH860129MH		
>CP Cancelled & Call Sign Deleted 920612							
WGSY	261A	Phenix City	AL	313.6	32.31	31.0	1.31 <
LI CN	32 30 42	85 00 41	6.000 kW	100M	20.1	19.3	
The Woodfin Group					BMLH900403KA		
WCJM	265A	West Point	GA	330.1	74.71	72.0	2.71 <
LI CN	32 53 42	85 09 32	1.850 kW	72M	46.4	44.8	
Radio Valley, Inc.					BLH6035		
WCJM.C	265A	West Point	GA	330.3	74.76	72.0	2.76 <
CP ZCN	32 53 48	85 09 24	6.000 kW	54M	46.5	44.8	
Radio Valley, Inc.					BPH910801IE		
AP267	267A	Smiths	AL	290.5	36.83	31.0	5.83
AP CN	32 25 37	85 07 45	6.000 kW	100M	22.9	19.3	
Arthur C. & Margaret R. Angel					BPH930302MJ 930618		
AP267	267A	Smiths	AL	290.5	36.83	31.0	5.83
AP CN	32 25 37	85 07 45	6.000 kW	100M	22.9	19.3	
Cheryl Davis					BPH930301MF 930618		
AP267	267A	Smiths	AL	289.9	37.67	31.0	6.67
AP CN	32 25 35	85 08 20	6.000 kW	100M	23.4	19.3	
Smiths Broadcasting, L.P.					BPH930301MG 930618		
ALOPEN	267A	Smiths	AL	297.9	39.67	31.0	8.67
AL N	32 28 42	85 08 06	0.000 kW	0M	24.7	19.3	
92-199 WO= 930129					930301		
AP267	267A	Smiths	AL	293.8	41.22	31.0	10.22
AP CN	32 27 39	85 09 48	6.000 kW	100M	25.6	19.3	
Smiths Station Broadcasting					BPH930301MH 930618		
>Amended 930415							

264A CUSSETA, GA

SEARCHING AT SIGNATURE BROADCASTING, LTD
SITE

EXHIBIT #3C

COUNTERPROPOSAL TO DOC
93-270 ON BEHALF OF
TRI-COUNTY BCSTG CO AND
MONTEZUMA BROADCASTING

DECEMBER 1993

BROMO
COMMUNICATIONS

BROADCAST
TECHNICAL CONSULTANTS

St Simons Island, Georgia

Washington, D.C.

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

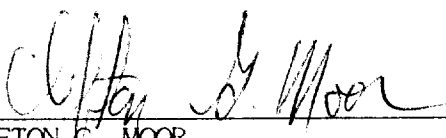
State of Georgia)
St. Simons Island) ss:
County of Glynn)

CLIFTON G. MOOR being duly sworn, deposes and says that he is an officer of Bromo Communications, Inc. Bromo has been engaged by Tri-County Broadcasting, licensee of WCEH Radio Station, and Montezuma Broadcasting to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in broadcast engineering since 1966.


The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 16th day of December, 1993.



CLIFTON G. MOOR
Affiant

Sworn to and subscribed before
me this the 16th day of December, 1993.



Notary Public, State of Georgia
My Commission Expires: September 8, 1995

CERTIFICATE OF SERVICE

I, Dan J. Alpert, hereby certify that the foregoing document is being served by First Class Mail, postage prepaid, to the following persons:

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Greenville, AL 36037

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Dan J. Alpert